

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTSJOHN TYTULA,
Plaintiff,

vs.

CONSOLIDATED RAIL CORPORATION
and CSX TRANSPORTATION, INC.,
Defendants.

CIVIL ACTION NO.: 05-30143-KPN

JOINT MOTION TO EXTEND DEADLINES

The defendants, Consolidated Rail Corporation and CSX Transportation, Inc., and the plaintiff, John Tytula, respectfully moves to extend, for ninety (90) days, the deadlines in this case, as well as reschedule the case management conference. As grounds for this motion, the parties state they are continuing to compile voluminous responses to written discovery and request the additional time in order to complete and exchange said responses and to schedule and conduct several depositions. Further, counsel for the defendants are currently scheduled to appear for trial in Iowa District Court for Black Hawk County in Breitbach v. Iowa Northern Railway Company, et al., C.A. No. LACV094984, which would conflict with the currently scheduled case management conference.

Accordingly, the parties request the following extensions:

	<u>From</u>	<u>To</u>
Completion of non-expert discovery	5/5/06	8/4/06
Plaintiff's disclosure of expert witnesses:	4/5/06	7/5/06
Depositions of plaintiff's expert(s):	5/5/06	8/4/06
Defendant's disclosure of expert witnesses:	5/5/06	8/4/06

Depositions of defendant's expert(s): 6/7/06 9/7/06

In addition, counsel respectfully request that the case management conference in this matter, which is currently scheduled for June 14, 2006 be continued accordingly. This is the parties' first request for an extension of deadlines, and they anticipate that it will be their sole and final such request.

WHEREFORE, for the foregoing reasons, the parties respectfully request that the instant *Motion* be GRANTED.

Respectfully submitted,
The Defendants,
Consolidated Rail Corporation and
CSX Transportation, Inc.
By Their Attorneys:

s/Lori A. Wirkus

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The plaintiff,
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Dated: March 13, 2006

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